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*1394 East Jefferson*  
*Detroit, Michigan 48207*  
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August 21, 2008

**BY E-MAIL AND REGULAR MAIL**

Kelly G. Keenan, Esq.  
Legal Counsel to the Governor  
111 S. Capitol Ave,  
Lansing, MI 48909

**Re; Petition and Charges to Governor Seeking  
Removal of Honorable Kwame M. Kilpatrick**

Dear Mr. Keenan,

Attached please find a Second Supplemental Witness List. Again we respectfully ask leave to file this notice six days late. The proposed purpose of the testimony of the two newly listed witnesses is to be available, and to hold themselves out as such, to testify in connection with any claims or contentions that appear in the Removal Petition and supporting affidavit. The explanation for the lateness of the filing is that Council

Members anticipated they would be engaged in Forfeiture proceedings, which were cancelled on August 18, as a result of the Wayne County Circuit Court ruling. Since August 18<sup>th</sup>, due to time constraints necessitated by filing of response briefs in this proceeding, counsel has only today been able to confer and consult with Council members and to receive approval that these two names be listed.

We have reason to believe that both of the newly listed witnesses may have previously transcribed testimony, in the possession of counsel for the respondent. We would ask that Respondent mark those transcripts as exhibits for the forthcoming hearing. In addition we request that *all* transcripts of any listed witness, whether listed by Petitioner or Respondent, be marked and by Respondent.

Once again we thank you for your attention and cooperation.

Respectfully,

/S/

William Goodman  
Goodman & Hurwitz, P.C.  
1394 East Jefferson Avenue  
Detroit, Michigan 48207  
(313) 567 6170

Mr. David Whitaker Esq.  
Director, Research and Analysis Division  
Detroit City Council  
2 Woodward Avenue  
Coleman A. Young Municipal Bldg  
Detroit, Michigan 48226

cc: Sharon McPhail, Esq.; James Thomas, Esq.

STATE OF MICHIGAN  
IN THE OFFICE OF THE HONORABLE JENNIFER GRANHOLM  
GOVERNOR

**In Re:**

**Petition and Charges of the Detroit City Council**

**Against**

**Honorable Kwame M. Kilpatrick**  
**Seeking His Removal for Acts of Official Misconduct**

**Petitioner's Second Supplemental Witness List and**  
**Brief Description of Proposed Testimony of Said Witness**

NOW COMES Petitioner and hereby notifies the Respondent that the Petitioner will or may call the following witnessed. Petitioner also herein notifies the Respondent as to the area of questions that Respondent proposes to ask this witnesses. Petitioner reserves the right to question these witnessed with regard to other matters should such matters emerge or arise during the cross examination of opposing counsel:

1. Detroit City Council President Honorable Kenneth Cockrel - stands ready to testify, if called as a witness, as to any of the matters raised in his Petition and Affidavit, filed herein before the Governor; and
2. Detroit City Council Member Honorable Kwame Kenyatta - stands ready to testify, if called as a witness, as to any of the matters raised in the Petition for Removal and attached Resolution of Council, calling for Removal, filed before the Governor, herein. He also may testify as to the circumstances under which the *Brown/Nelthrope/Harris* cases were brought before the Council's Internal Operations Committee on October 18, 2007 and the subsequent vote for that settlement of the entire Council, on Ocyober 23, 2008.

\_\_\_\_\_/S/\_\_\_\_\_  
William Goodman  
Goodman & Hurwitz, P.C.  
Special Counsel  
Detroit City Council

David Whitaker  
Director, Div. of Research and Analysis  
City of Detroit, City Council  
2 Woodward Avenue, Ste. 216  
Detroit, Michigan 48226

Dated: **August 21, 2008**

**CERTIFICATE OF SERVICE**

I hereby certify that on or by **21 August 2008**, I served the foregoing *Witness List*, by e-mail, fax and hand delivery to counsel for the Honorable Kwame M. Kilpatrick, specifically Sharon McPhail, Esq. (313-224-4128) and James Thomas, Esq. (313-963-9258).

\_\_\_\_\_/S/\_\_\_\_\_  
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